

HOGAN & HARTSON
L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

February 8, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

Re: Notification of the American Samoa Telecommunications Authority, FRN 0001726488; CC Docket No. 94-102

Dear Ms. Dortch:

The American Samoa Telecommunications Authority (“ASTCA”), by counsel, hereby notifies the Commission of its progress in implementing a handset-based Enhanced 911 (“E911”) system for its Tier III wireless operations in the Territory of American Samoa.

Pursuant to the *Order To Stay* ^{1/} and as discussed in ASTCA’s Interim Report, ^{2/} ASTCA began selling and activating Audiovox 9155 location-capable handsets on August 26, 2003. At that time, ASTCA had not received a request for E911 services from American Samoa’s only PSAP, the American Samoa Department of Public Safety (“Department of Public Safety”). ^{3/} As of this writing, ASTCA still has not received a request for E911 services from the Department of Public Safety.

The *Order To Stay* also indicates that ASTCA should ensure that 100 percent of all new digital handsets activated are location-capable no later than

^{1/} Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, *Order to Stay*, 17 FCC Rcd 14841, 14848 ¶ 33, 14856 Appendix A (2002).

^{2/} Interim Report of the American Samoa Telecommunications Authority, CC Docket No. 94-102 (filed Aug. 1, 2003) (“Interim Report”).

^{3/} *Id.* at 4.

HOGAN & HARTSON L.L.P.

Marlene H. Dortch
February 8, 2005
Page 2

November 30, 2004. ^{4/} In this regard, ASTCA can report that as of November 30, 2004, 100 percent of the handsets being sold by ASTCA were location-capable. In light of the fact that American Samoa's sole PSAP has not made any request for E911 services to date, however, ASTCA retail sales representatives continued through November 2004 to activate non-location-capable handsets purchased from sources other than ASTCA. Consistent with the *Order to Stay* and Section 20.18 of the Commission's rules, ASTCA has since instructed its customer service staff to discontinue activations of non-location-capable handsets that customers have purchased elsewhere.

With respect to ASTCA's system-wide E911 upgrade, ASTCA had previously reported that it anticipated completion by October 2004. ASTCA is pleased to report that the system upgrade was completed as scheduled.

ASTCA hereby reaffirms its commitment to continue to work in good faith to implement E911 service and its intention to keep the Commission apprised of its progress on E911 implementation.

If you have any questions or need any additional information, please contact the undersigned.

Respectfully submitted,

/s/

David L. Sieradzki
Matthew F. Wood
Counsel for the American Samoa
Telecommunications Authority

cc: Michael Wilhelm, Chief, Public Safety & Critical Infrastructure Division,
Wireless Telecommunications Bureau
Joseph P. Casey, Chief, Spectrum Enforcement Division, Enforcement
Bureau

^{4/} *Order To Stay*, 17 FCC Rcd at 14851 ¶ 33, 14856 Appendix A.